

EXHIBIT "B"

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CANDACE RAY

Plaintiff

v.

ABINGTON TOWNSHIP,
CHIEF OF POLICE WILLIAM KELLY,
POLICE OFFICER NISBET, S.,
POLICE OFFICER J. KING,
POLICE OFFICER BRUCE HASLAM,
POLICE OFFICER MATZ,
POLICE OFFICER RAWTZ,
POLICE OFFICER SCHOLL,
POLICE OFFICER MANN,
ABINGTON MEMORIAL HOSPITAL, and
MARK SCHNEE

Defendants

: CIVIL ACTION

: 02-CV-04382

**WITNESS LIST OF DEFENDANTS,
ABINGTON MEMORIAL HOSPITAL AND MARK SCHNEE**

A. PARTY WITNESSES

The following witnesses, if called, will testify as the party litigants to the instant action:

1. Candace Ray
2. Chief of Police, William Kelly
3. Police Officer Shaun Nisbet
4. Police Officer Jeanette King
5. Lieutenant Bruce Haslam
6. Police Officer John Matz

7. Police Officer Thomas Rawls
8. Police Officer Scott Scholl
9. Police Officer Robert Mann
10. Mark Schnee

B. FACT WITNESSES

The following witnesses, if called, will testify as to the medical treatment that Candace Ray received during her Emergency Trauma Center Admission at the Abington Memorial Hospital on June 2, 2000 and prior to that date:

1. David R. Theodorson, M.D.
2. Marianne Kelly, R.N.
3. Jennifer Curry Federer, R.N.
4. Lisa Ann Kutz, L.P.N.
5. Hal Hockfield, M.D.
6. Designee from Institutional Services Department at Abington Memorial Hospital
7. Designee from Security Department at Abington Memorial Hospital

The following witnesses, if called, will testify as to Candace Ray's background, health, employment, social interests and arrest on July 2, 2000:

8. John R. Grob
9. Christopher W. Stewart

C. EXPERT WITNESSES

The following witnesses, if called, will testify as experts on behalf of the Defendants concerning issues of negligence, causation and damages:

1. Timothy Michals, M.D.

Defendants, Abington Memorial Hospital and Mark Schnee, reserve the right to call as a fact and/or expert witness any individual mentioned or referred to in any medical record or report, deposition, Interrogatory answers, responses to a Request for Production of Documents or Request for Admissions, or any other documents produced during or generated as a result of the instant lawsuit.

Defendants, Abington Memorial Hospital and Mark Schnee, reserve the right to call any witness identified on the Witness List of any party to this action as a fact and/or expert witness.

Defendants, Abington Memorial Hospital and Mark Schnee, specifically reserve the right to petition the Trial Judge to supplement the within Witness List should the interests of justice permit.

Respectfully Submitted,

WHITE AND WILLIAMS LLP

BY: 

David R. Zaslow, Esquire
Attorneys for Defendants,
Abington Memorial Hospital and
Mark Schnee